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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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| UNITED STATES OF AMERICA, | ) | SUPERSEDING INDICTMENT |
| Plaintiff, | ) | |
| v. | ) | CASE NO.1: 15 CR 308 |
| | ) | Title 18, Section 1956(h), United States Code |
| JAMES SORGI, ROBERT SERINA, STUART PFLAUM, CRAIG KAVAK, ALLYSON LOVE, DINO SILVESTRI, DUSTIN ALLRED, MADELAINE DAVIDSON, DANIEL LINTON, | ) | CHIEF JUDGE SOLOMON OLIVER |
| Defendants. | ) | |

COUNT 1

The Grand Jury charges:

From on or about June 2013 through February 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants JAMES SORGI, ROBERT SERINA, STUART PFLAUM, CRAIG KAVAK, ALLYSON LOVE, DINO SILVESTRI, DUSTIN ALLRED, MADELAINE DAVIDSON, and DANIEL LINTON did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of marijuana, a Schedule I controlled substance, in violation of Title 21 United States Code, § 841(a)(1), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

## MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

### I. BACKGROUND OF THE ORGANIZATION

A. JAMES SORGI organized, directed, managed, and operated a drug trafficking organization (hereinafter referred to as the SORGI DTO) that imported marijuana from California into the Northern District of Ohio for distribution. SORGI also organized, managed, and operated a money laundering organization (hereinafter referred to as the SORGI MLO) that laundered the proceeds of the DTO's marijuana sales.

B. JAMES SORGI grew marijuana for the SORGI DTO and also used other marijuana growers in Northern California to grow marijuana for his DTO.

C. JAMES SORGI, on his own, and through Lavivian Wright (named but not indicted herein), directed members of his DTO in California to ship multi-pound quantities of marijuana from California to the Northern District of Ohio via the United States Mail.

D. JAMES SORGI, on his own, and through ROBERT SERINA and STUART PFLAUM, directed members of his DTO in the Northern District of Ohio to receive the packages of multi-pound quantities of marijuana from members of his DTO in California. When the marijuana arrived in Ohio, SORGI directed members of his DTO to collect the marijuana packages and sell the marijuana in the Northern District of Ohio.

E. JAMES SORGI, on his own, and through ROBERT SERINA and STUART PFLAUM, directed members of his DTO in the Northern District of Ohio to collect proceeds from marijuana sales and directed members of the MLO to store marijuana proceeds for him in the Northern District of Ohio.

F. JAMES SORGI, through Lavivian Wright, directed members of his MLO in California and elsewhere to use their bank accounts to funnel marijuana proceeds from Ohio to California. SORGI, on his own, and through ROBERT SERINA, directed members of his MLO in Ohio to make cash deposits of marijuana proceeds into these accounts. SORGI, on his own, and through Lavivian Wright, directed members of his organization in California to withdraw the proceeds from these accounts.

G. JAMES SORGI, through STUART PFLAUM, directed members of his MLO to convert marijuana proceeds from U.S. currency into money orders. JAMES SORGI, through ROBERT SERINA, also directed members of his organization to ship marijuana proceeds in the form of U.S. currency and money orders from the Northern District of Ohio to California.

H. JAMES SORGI, through Lavivian Wright, directed members of his MLO to receive marijuana proceeds in the form of U.S. currency and money orders in California.

I. JAMES SORGI directed members of his MLO and others to carry marijuana proceeds from Ohio to California.

## II. MAILING AND DISTRIBUTING MARIJUANA FROM CALIFORNIA TO THE NORTHERN DISTRICT OF OHIO

A. JAMES SORGI, CRAIG KAVAK, DINO SILVESTRI, M.S. (an individual known to the grand jury, but not indicted herein), and others unknown to the Grand Jury, grew marijuana in California for the SORGI DTO.

B. The SORGI DTO used the United States Mail to ship multi-pound quantities of marijuana from California to the Northern District of Ohio for distribution in Ohio.

C. Lavivian Wright, CRAIG KAVAK, DINO SILVESTRI, and others unknown to the Grand Jury, mailed and assisted in mailing packages containing multi-pound quantities of marijuana to the Northern District of Ohio for the SORGI DTO. Wright also recruited others to mail packages containing multi-pound quantities of marijuana to Ohio.

D. JAMES SORGI, CRAIG KAVAK, ROBERT SERINA, Fred Bagi (named but not indicted herein), STUART PFLAUM, DINO SILVESTRI, Joshua Watkins (named but not indicted herein), Ryan Rodriguez (named but not indicted herein), K.M. (an individual known to the grand jury, but not indicted herein), Wendi Vicory (named but not indicted herein), K.E. (an individual known to the grand jury, but not indicted herein), and others unknown to the Grand Jury, received packages in the Northern District of Ohio containing multi-pound quantities of marijuana that members of the SORGI DTO mailed from California.

E. CRAIG KAVAK, B.M. (an individual known to the grand jury, but not indicted herein), and others known and unknown to the Grand Jury, sold marijuana to various customers in the Northern District of Ohio.

F. ROBERT SERINA and STUART PFLAUM collected packages containing marijuana from other DTO members.

G. Joshua Watkins stored marijuana proceeds in the Northern District of Ohio for JAMES SORGI. Watkins stored marijuana proceeds at his residence in the Northern District of Ohio. STUART PFLAUM and others brought the marijuana proceeds to Watkins.

## III. SHIPPING AND TRANSPORTING MARIJUANA PROCEEDS AS CASH FROM THE NORTHERN DISTRICT OF OHIO TO CALIFORNIA

A. ROBERT SERINA prepared packages containing marijuana proceeds in the form of U.S. currency for shipment to members of the SORGI MLO in California. SERINA instructed and directed members of the SORGI MLO to send the marijuana proceeds to members of the MLO in California via the United States Mail.

B. JAMES SORGI, Fred Bagi, DINO SILVESTRI, and Wendi Vicory sent marijuana proceeds from the Northern District of Ohio to members of the SORGI MLO in California via the U.S. Mail.

C. Lavivian Wright received the cash proceeds from marijuana at her residence in California that the other SORGI MLO members sent from Ohio. Wright gave the cash proceeds to SORGI after she received them.

## IV. SHIPPING MARIJUANA PROCEEDS AS MONEY ORDERS FROM THE NORTHERN DISTRICT OF OHIO TO CALIFORNIA

A. JAMES SORGI also directed members of his organization to convert the proceeds from the marijuana sales from cash into money orders. STUART PFLAUM provided the proceeds from the marijuana sales in the form of U.S. currency to Ryan Rodriguez (named but not indicted herein) and instructed him to convert the cash proceeds into money orders. PFLAUM also gave Rodriguez amounts, payee names, and addresses for Rodriguez to use when he purchased the money orders. At PFLAUM's direction, Rodriguez converted the marijuana proceeds into money orders by going to various locations so as not to raise law enforcement suspicion. The money orders were made out in lesser amounts so as not to raise law enforcement suspicion. PFLAUM paid Rodriguez to purchase and mail money orders on behalf of the SORGI MLO.

B. Money orders purchased with marijuana proceeds were made payable to STUART PFLAUM, Lavivian Wright, D.J. (an individual known to the grand jury, but not indicted herein), CRAIG KAVAK, J.M. (named but not indicted herein), P.C. (an individual known to the grand jury, but not indicted herein), M.S., and others known and unknown to the Grand Jury.

C. STUART PFLAUM directed Ryan Rodriguez to mail the money orders via the U.S. Mail to members of the SORGI MLO in California. PFLAUM gave Rodriguez instructions as to where to mail the money orders including the names and addresses to place on the packages.

D. Lavivian Wright received marijuana proceeds from the Northern District of Ohio in the form of money orders at her residence in California. Lavivian Wright recruited T.M. (an individual known to the grand jury, but not indicted herein), J.M., and others to cash the money orders in California. At Wright's direction, T.M., J.M., and others cashed the money orders and gave the cash to Wright, who then gave the cash to JAMES SORGI.

## V. FUNNELING MARIJUANA PROCEEDS THROUGH BANK ACCOUNTS FROM THE NORTHERN DISTRICT OF OHIO TO CALIFORNIA

A. JAMES SORGI directed members of his organization and others to deposit the proceeds from marijuana sales into various bank accounts in the Northern District of Ohio and elsewhere for members of the MLO and others to withdraw in California. DUSTIN ALLRED, J.C. (an individual known to the grand jury, but not indicted herein), M.C. (an individual known to the grand jury, but not indicted herein), MADELAINE DAVIDSON, C.E. (an individual known to the grand jury, but not indicted herein), CRAIG KAVAK, DANIEL LINTON, A.L. (an individual known to the grand jury, but not indicted herein), ALLYSON LOVE, M.L. (an individual known to the grand jury, but not indicted herein), STUART PFLAUM, N.V. (an individual known to the grand jury, but not indicted herein), Joshua Watkins, Lavivian Wright, S.Z. (an individual known to the grand jury, but not indicted herein), and others in the Northern District of Ohio and elsewhere used their bank accounts to transfer the proceeds from marijuana sales in the Northern District of Ohio to SORGI in California.

B. Fred Bagi, CRAIG KAVAK, STUART PFLAUM, A.S. (an individual known to the grand jury, but not indicted herein), DINO SILVESTRI, JAMES SORGI, Wendi Vicory, Joshua Watkins, and others made cash deposits of marijuana proceeds into their bank accounts and the bank accounts of other members of the SORGI MLO so that SORGI and other members of his MLO could receive the marijuana proceeds in California. At SORGI's direction, these MLO members made deposits into these accounts in amounts less than $10,000 each to avoid detection by law enforcement.

C. ROBERT SERINA directed Fred Bagi, DINO SILVESTRI, Wendi Vicory, and others to deposit marijuana proceeds into funnel accounts to transfer the money to JAMES SORGI in California. SERINA provided the cash proceeds for deposit to Bagi and Vicory.

SERINA instructed Bagi and Vicory how to make the deposits including the names and accounts numbers.

D. STUART PFLAUM directed Joshua Watkins and others to deposit marijuana proceeds into funnel accounts to transfer the money to JAMES SORGI in California. PFLAUM provided the cash proceeds from marijuana sales for deposit to Watkins and instructed Watkins how to make the deposits including the names, accounts numbers, and banks to use.

E. DUSTIN ALLRED, J.C., M.C., MADELAINE DAVIDSON, C.E., CRAIG KAVAK, DANIEL LINTON, A.L., ALLYSON LOVE, M.L., STUART PFLAUM, N.V., Joshua Watkins, Lavivian Wright, S.Z., and others withdrew the deposited marijuana proceeds from their bank accounts in California. DANIEL LINTON, A.L., and M.L. gave the cash from the withdrawals to Lavivian Wright. Wright, Watkins, S.Z., and others gave the cash withdrawals to SORGI.

**ACTS IN FURTHERANCE OF THE CONSPIRACY**

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed acts in furtherance of the conspiracy in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. On June 4, 2013, in California, a member of the SORGI DTO attempted to send 7 pounds of marijuana to JAMES SORGI at an apartment at 14921 Lake Avenue in Lakewood, Ohio, via the United States Mail.

2. On June 20, 2013, in Cleveland, Ohio, JAMES SORGI deposited $8,000 of marijuana proceeds into A.L.'s Chase Bank account.

3. On June 20, 2013, in Arcata, California, A.L. withdrew $8,000 of marijuana proceeds from his Chase Bank account.

4. On June 24, 2013, in Cleveland, Ohio, Wendi Vicory deposited $9,500 of marijuana proceeds into A.L.'s Chase Bank account.

5. On June 24, 2013, in Arcata, California, A.L. withdrew $9,500 of marijuana proceeds from his Chase Bank account.

6. On June 27, 2013, in Cleveland, Ohio, Wendi Vicory deposited $9,500 of marijuana proceeds into A.L.'s Chase Bank account.

7. On June 27, 2013, in Arcata, California, A.L. withdrew $9,500 of marijuana proceeds from his Chase Bank account.

8. On July 1, 2013, in Cleveland, Ohio, JAMES SORGI deposited $9,000 of marijuana proceeds into A.L.'s Chase Bank account.

9. On July 1, 2013, in Arcata, California, A.L. withdrew $9,000 of marijuana proceeds from his Chase Bank account.

10. On July 2, 2013, in Cleveland, Ohio, JAMES SORGI deposited $6,000 of marijuana proceeds into A.L.'s Chase Bank account.

11. On July 3, 2013, in Arcata, California, A.L. withdrew $7,700 from his Chase Bank Account, $6,000 of which was marijuana proceeds.

12. On July 5, 2013, in Cleveland, Ohio, JAMES SORGI and DINO SILVESTRI deposited $9,200 of marijuana proceeds into A.L.'s Chase Bank account.

13. On July 5, 2013, in Arcata, California, A.L. withdrew $9,222 from his Chase Bank account, $9,200 of which was marijuana proceeds.

14. On July 6, 2013, in Rocky River, Ohio, a member of the SORGI MLO deposited $6,000 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

15. On July 8, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

16. On July 8, 2013, in Cleveland, Ohio, JAMES SORGI deposited $8,000 of marijuana proceeds into A.L.'s Chase Bank account.

17. On July 8, 2013, in Arcata, California, A.L. withdrew $8,000 of marijuana proceeds from his Chase Bank account.

18. On July 8, 2013, in Eureka, California, DANIEL LINTON withdrew $6,000 of marijuana proceeds from his Chase Bank account.

19. On July 9, 2013, in Cleveland, Ohio, JAMES SORGI deposited $8,000 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

20. On July 9, 2013, in Eureka, California, DANIEL LINTON withdrew $7,900 of marijuana proceeds from his Chase Bank account.

21. On July 10, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

22. On July 10, 2013, in Cleveland, Ohio, DINO SILVESTRI deposited $8,000 of marijuana proceeds into A.L.'s Chase Bank account.

23. On July 10, 2013, in Arcata, California, A.L. withdrew $8,000 of marijuana proceeds from his Chase Bank account.

24. On July 10, 2013, in Rocky River, Ohio, DINO SILVESTRI deposited $8,000 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

25. On July 10, 2013, in Eureka, California, DANIEL LINTON withdrew $7,900 of marijuana proceeds from his Chase Bank account.

26. On July 11, 2013, in Brunswick, Ohio, Wendi Vicory deposited $8,000 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

27. On July 12, 2013, in Eureka, California, DANIEL LINTON withdrew $7,990 of marijuana proceeds from his Chase Bank account.

28. On July 12, 2013, Wendi Vicory received a package under the fictitious name "Wendi Duhan" at an address on Granger Road in Medina, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

29. On July 13, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

30. On July 13, 2013, Wendi Vicory received a package under the fictitious name "Wendi Duhan" at an address on Granger Road in Medina, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

31. On July 16, 2013, in Brunswick, Ohio, Wendi Vicory deposited $8,500 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

32. On July 16, 2013, in Eureka, California, DANIEL LINTON withdrew $8,400 of marijuana proceeds from his Chase Bank account.

33. On July 17, 2013, in Strongsville, Ohio, Wendi Vicory deposited $9,500 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

34. On July 17, 2013, in Eureka, California, DANIEL LINTON withdrew $9,400 of marijuana proceeds from his Chase Bank account.

35. On July 18, 2013, in Brunswick, Ohio, Wendi Vicory deposited $9,500 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

36. On July 18, 2013, in Eureka, California, DANIEL LINTON withdrew $9,400 of marijuana proceeds from his Chase Bank account.

37. On July 19, 2013, in Strongsville, Ohio, Wendi Vicory deposited $6,800 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

38. On July 20, 2013, Wendi Vicory received a package under the fictitious name "Wendi Duhan" at an address on Granger Road in Medina, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

39. On July 20, 2013, in Brunswick, Ohio, a member of the SORGI MLO deposited $9,500 of marijuana proceeds into DANIEL LINTON's Chase Bank account.

40. On July 22, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

41. On July 22, 2013, in Eureka, California, DANIEL LINTON withdrew $8,000 of marijuana proceeds from his Chase Bank account.

42. On July 23, 2013, in Eureka, California, DANIEL LINTON withdrew $4,000 of marijuana proceeds from his Chase Bank account.

43. On July 24, 2013, DINO SILVESTRI sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

44. On July 24, 2013, in Eureka, California, DANIEL LINTON withdrew $4,000 of marijuana proceeds from his Chase Bank account.

45. On July 27, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from DINO SILVESTRI.

46. On July 27, 2013, Wendi Vicory received a package under the fictitious name "Wendi Duhan" at an address on Granger Road in Medina, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

47. On July 30, 2013, Wendi Vicory sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

48. On July 30, 2013, in Akron, Ohio, Wendi Vicory deposited $8,700 of marijuana proceeds into M.C.'s Chase Bank account.

49. On July 31, 2013, in Eureka, California, M.C. withdrew $8,650 of marijuana proceeds from her Chase Bank account.

50. On August 2, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Wendi Vicory.

51. On August 2, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

52. On August 2, 2013, in Cleveland, Ohio, a member of the SORGI MLO deposited $4,700 of marijuana proceeds into M.C.'s Chase Bank account.

53. On August 5, 2013, in Cleveland, Ohio, CRAIG KAVAK deposited $4,800 of marijuana proceeds into M.C.'s Chase Bank account.

54. On August 5, 2013, in Arcata, California, M.C. withdrew $4,700 of marijuana proceeds from her Chase Bank account.

55. On August 8, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

56. On August 8, 2013, in Eureka, California, M.C. withdrew $4,800 of marijuana proceeds from her Chase Bank account.

57. On August 12, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

58. On August 12, 2013, Wendi Vicory received a package under the fictitious name "Wendi Duhan" at an address on Granger Road in Medina, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

59. On August 12, 2013, in California, a member of the SORGI DTO attempted to send 5 pounds of marijuana to an apartment at 11871 Lake Avenue in Lakewood, Ohio, via the United States Mail.

60. On August 14, 2013, a member of the SORGI DTO attempted to mail 5 pounds of marijuana to Wendi Vicory at an address on Granger Road in Medina, Ohio, from California via the United States Mail.

61. On August 14, 2013, in Cleveland, Ohio, Wendi Vicory deposited $9,200 of marijuana proceeds into M.C.'s Chase Bank account.

62. On August 14, 2013, in Eureka, California, M.C. withdrew $9,000 of marijuana proceeds from her Chase Bank account.

63. On August 19, 2013, Joshua Watkins received two packages at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

64. On August 22, 2013, Joshua Watkins received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

65. On August 26, 2013, in Cleveland, Ohio, a member of the SORGI DTO deposited $5,950 of marijuana proceeds into M.C.'s Chase Bank account.

66. On August 26, 2013, in Eureka, California, M.C. withdrew $5,950 of marijuana proceeds from her Chase Bank account.

67. On August 26, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI DTO.

68. On August 27, 2013, DINO SILVESTRI sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

69. On August 30, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from DINO SILVESTRI.

70. On August 31, 2013, JAMES SORGI sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

71. On August 31, 2013, in Cleveland, Ohio, STUART PFLAUM deposited $8,850 of marijuana proceeds into his Chase Bank account.

72. On August 31, 2013, in Cleveland, Ohio, a member of the SORGI MLO deposited $7,000 of marijuana proceeds into CRAIG KAVAK's Chase Bank account.

73. On September 3, 2013, in Cleveland, Ohio, a member of the SORGI MLO deposited $600 of marijuana proceeds into CRAIG KAVAK's Chase Bank account.

74. On September 3, 2013, in Arcata, California, CRAIG KAVAK withdrew $7,000 of marijuana proceeds from his Chase Bank account.

75. On September 3, 2013, in Eureka, California, STUART PFLAUM withdrew $8,850 of marijuana proceeds from his Chase Bank account.

76. On September 3, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from DINO SILVESTRI.

77. On September 6, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

78. On September 6, 2013, Joshua Watkins received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

79. On September 6, 2013, in Parma, Ohio, a member of the SORGI MLO deposited $600 of marijuana proceeds into CRAIG KAVAK's Chase Bank account.

80. On September 6, 2013, a member of the SORGI MLO sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

81. On September 7, 2013, a member of the SORGI MLO sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

82. On September 7, 2013, in Rocky River, Ohio, DINO SILVESTRI deposited $9,000 of marijuana proceeds into CRAIG KAVAK's Chase Bank account.

83. On September 7, 2013, in Arcata, California, CRAIG KAVAK withdrew $8,700 of marijuana proceeds from his Chase Bank account.

84. On September 7, 2013, in Cleveland, Ohio, DINO SILVESTRI deposited $9,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

85. On September 7, 2013, in Eureka, California, STUART PFLAUM withdrew $9,000 of marijuana proceeds from his Chase Bank account.

86. On September 9, 2013, in Independence, Ohio, A.S. deposited $9,000 of marijuana proceeds into CRAIG KAVAK's Chase Bank account.

87. On September 9, 2013, in Eureka, California, CRAIG KAVAK withdrew $9,000 of marijuana proceeds from his Chase Bank account.

88. On September 9, 2013, in Cleveland, Ohio, A.S. deposited $9,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

89. On September 9, 2013, in Eureka, California, STUART PFLAUM withdrew $9,000 of marijuana proceeds from his Chase Bank account.

90. On September 9, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI MLO.

91. On September 10, 2013, in Parma, Ohio, Fred Bagi deposited $5,000 of marijuana proceeds into J.C.'s US Bank account.

92. On September 10, 2013, a member of the SORGI MLO deposited $1,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

93. On September 10, 2013, DINO SILVESTRI picked up a package at the post office that was addressed to him at an address on Vienna Drive in Parma, Ohio, that contained multi-pound quantities of marijuana from the SORGI DTO in California.

94. On September 10, 2013, in Parma, Ohio, a member of the SORGI MLO deposited $8,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

95. On September 10, 2013, in Eureka, California, STUART PFLAUM withdrew $9,000 of marijuana proceeds from his Chase Bank account.

96. On September 10, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from a member of the SORGI MLO.

97. On September 11, 2013, in Strongsville, Ohio, DINO SILVESTRI deposited $9,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

98. On September 11, 2013, in Arcata, California, STUART PFLAUM withdrew $8,860 of marijuana proceeds from his Chase Bank account.

99. On September 13, 2013, in Strongsville, Ohio, Joshua Watkins deposited $7,450 of marijuana proceeds into his Chase Bank account.

100. On September 14, 2013, in Millbrae, California, Joshua Watkins withdrew $7,450 of marijuana proceeds from his Chase Bank account.

101. On September 16, 2013, in Bedford Heights, Ohio, Fred Bagi deposited $8,850 of marijuana proceeds into Joshua Watkins' Chase Bank account.

102. On September 16, 2013, in Burlingame, California, Joshua Watkins withdrew $8,850 of marijuana proceeds from his Chase Bank account.

103. On September 17, 2013, in Cleveland, Ohio, Fred Bagi deposited $5,000 of marijuana proceeds into J.C.'S US Bank account.

104. On September 17, 2013, in Arcata, California, J.C. withdrew $10,000 of marijuana proceeds from his US Bank account.

105. On September 17, 2013, Fred Bagi sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

106. On September 20, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Fred Bagi.

107. On September 20, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

108. On September 21, 2013, Joshua Watkins received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

109. On September 26, 2013, a member of the SORGI MLO deposited $1,000 of marijuana proceeds into STUART PFLAUM's Chase Bank account.

110. On September 26, 2013, in San Francisco, California, STUART PFLAUM withdrew $500 of marijuana proceeds from his Chase Bank account.

111. On September 27, 2013, DINO SILVESTRI received a package at an address on Vienna Drive in Parma, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

112. On September 30, 2013, in San Francisco, California, STUART PFLAUM withdrew $380 and $100 of marijuana proceeds from his Chase Bank account.

113. On or about October 2013, ROBERT SERINA gave S.Z. approximately $9,000 of marijuana proceeds to transport to California for the SORGI MLO.

114. On or about October 2013, S.Z. flew to San Francisco with $9,000 of marijuana proceeds and gave the $9,000 to JAMES SORGI.

115. On October 2, 2013, Fred Bagi sent marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

116. On October 5, 2013, Lavivian Wright received marijuana proceeds in the United States Mail at her residence in McKinleyville, California, from Fred Bagi.

117. On October 5, 2013, Fred Bagi attempted to send $5,400 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

118. On October 5, 2013, a member of the SORGI MLO attempted to send $5,500 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

119. On October 7, 2013, a member of the SORGI MLO attempted to send $5,500 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

120. On October 7, 2013, a member of the SORGI MLO attempted to send $5,500 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

121. On October 9, 2013, Fred Bagi attempted to send $7,000 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

122. On October 9, 2013, Fred Bagi attempted to send $8,500 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

123. On or about October 10, 2013, S.Z. opened an account at Chase Bank to assist JAMES SORGI in the transfer of marijuana proceeds from Ohio to California.

124. On October 10, 2013, in Cleveland, Ohio, S.Z. deposited $8,000 of marijuana proceeds into S.Z.'s Chase Bank account.

125. On October 10, 2013, Fred Bagi attempted to send $8,700 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

126. On October 11, 2013, a member of the SORGI MLO attempted to send $5,000 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

127. On October 11, 2013, a member of the SORGI MLO attempted to send $5,000 of marijuana proceeds in the United States Mail to Lavivian Wright in McKinleyville, California.

128. In October 2013, ROBERT SERINA gave S.Z. approximately $9,000 of marijuana proceeds to transport to SORGI in California. S.Z. flew to California with the $9,000 and gave the cash to SORGI.

129. On October 11, 2013, in San Francisco, California, S.Z. withdrew $8,000 of marijuana proceeds from her Chase Bank account. S.Z. gave the cash proceeds to JAMES SORGI.

130. On October 15, 2013, in Cleveland, Ohio, Fred Bagi deposited $8,300 of marijuana proceeds into S.Z.'s Chase Bank account.

131. On October 15, 2013, in Arcata, California, S.Z. withdrew $8,300 of marijuana proceeds from her Chase Bank account. S.Z. gave the cash proceeds to JAMES SORGI.

132. On October 18, 2013, Joshua Watkins received a package at an address on Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

133. On October 19, 2013, in Berea, Ohio, DINO SILVESTRI deposited $7,900 of marijuana proceeds into S.Z.'s Chase Bank account.

134. On October 19, 2013, in Berea, Ohio, a member of the SORGI MLO deposited $100 of marijuana proceeds into S.Z.'s Chase Bank account.

135. On October 19, 2013, in Arcata, California, S.Z. withdrew $8,000 of marijuana proceeds from her Chase Bank account.

136. On October 21, 2013, in Berea, Ohio, Fred Bagi deposited $8,650 of marijuana proceeds into C.E.'s Chase Bank account.

137. On October 21, 2013, in Arcata, California, C.E. withdrew $8,600 of marijuana proceeds from his Chase Bank account.

138. On October 22, 2013, in Cleveland, Ohio, a member of the SORGI MLO deposited $9,420 of marijuana proceeds into DUSTIN ALLRED's Chase Bank account.

139. On October 22, 2013, in Arcata, California, DUSTIN ALLRED withdrew $9,300 of marijuana proceeds from his Chase Bank account.

140. On October 24, 2013, K.M. received a package at an address on Ledge Drive in Northfield, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

141. On October 24, 2013, Joshua Watkins received a package at an address on Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

142. On October 24, 2013, in Seven Hills, Ohio, Fred Bagi deposited $8,260 of marijuana proceeds into DUSTIN ALLRED's Chase Bank account.

143. On October 24, 2013, in Arcata, California, DUSTIN ALLRED withdrew $8,000 of marijuana proceeds from his Chase Bank account.

144. On October 25, 2013, Joshua Watkins received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

145. On October 25, 2013, in Independence, Ohio, Fred Bagi deposited $9,300 of marijuana proceeds into DUSTIN ALLRED's Chase Bank account.

146. On October 25, 2013, in Arcata, California, DUSTIN ALLRED withdrew $9,300 of marijuana proceeds from his Chase Bank account.

147. On October 28, 2013, in California, a member of the SORGI DTO attempted to send 6 pounds of marijuana to Fred Bagi at an address on Sutherland Avenue in Akron, Ohio, via the United States Mail.

148. On October 28, 2013, in Wadsworth, Ohio, a member of the SORGI MLO deposited $4,000 of marijuana proceeds into DUSTIN ALLRED's Chase Bank account.

149. On October 28, 2013, in Arcata, California, DUSTIN ALLRED withdrew $3,800 of marijuana proceeds from his Chase Bank account.

150. On October 29, 2013, a member of the SORGI DTO attempted to send 6 pounds of marijuana to Wendi Vicory at an address on Duxbury Lane in Brunswick, Ohio, from California via the United States Mail.

151. On October 31, 2013, Wendi Vicory received a package under the fictitious name "Marie Vicory" at an address on Duxbury Lane in Brunswick, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

152. On October 31, 2013, in California, DINO SILVESTRI sent a package containing multi-pound quantities of marijuana to K.M. in Northfield, Ohio, via the U.S. Mail.

153. On November 1, 2013, in California, DINO SILVESTRI attempted to send 5 pounds of marijuana to Joshua Watkins at an address on Old Pleasant Valley Road in Middleburgh Heights, Ohio, via the United States Mail.

154. On November 2, 2013, Wendi Vicory received a package under the fictitious name "Marie Vicory" at an address on Duxbury Lane in Brunswick, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

155. On November 5, 2013, K.M. received a package at an address on Ledge Drive in Northfield, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the DINO SILVESTRI in California.

156. On November 7, 2013, in Medina, Ohio, Wendi Vicory deposited $8,550 of marijuana proceeds into MADELAINE DAVIDSON's Chase Bank account.

157. On November 7, 2013, in Arcata, California, MADELAINE DAVIDSON withdrew $8,500 from her Chase Bank account.

158. On November 8, 2013, in Parma, Ohio, a member of the SORGI MLO deposited $9,300 of marijuana proceeds into DUSTIN ALLRED's Chase Bank account.

159. On November 8, 2013, in Arcata, California, DUSTIN ALLRED withdrew $9,300 of marijuana proceeds.

160. On November 9, 2013, in Medina, Ohio, a member of the SORGI MLO deposited $9,300 of marijuana proceeds into MADELAINE DAVIDSON's Chase Bank account.

161. On November 9, 2013, in Eureka, California, MADELAINE DAVIDSON withdrew $9,300 of marijuana proceeds from her Chase Bank account.

162. On November 12, 2013, Joshua Watkins received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

163. On November 18, 2013, in Woodmere, Ohio, a member of the SORGI MLO deposited $2,000 of marijuana proceeds into ALLYSON LOVE's Bank of America account.

164. On November 22, 2013, in Akron, Ohio, Wendi Vicory deposited $9,300 of marijuana proceeds into MADELAINE DAVIDSON's Chase Bank account.

165. On November 22, 2013, in Arcata, California, MADELAINE DAVIDSON withdrew $9,000 of marijuana proceeds from her Chase Bank account.

166. On November 27, 2013, in Cuyahoga Falls, Ohio, a member of the SORGI MLO deposited $9,300 of marijuana proceeds into N. V.'s Chase Bank account.

167. On November 27, 2013, in Eureka, California, N.V. withdrew $9,000 of marijuana proceeds from her Chase Bank account.

168. On November 30, 2013, in Parma, Ohio, a member of the SORGI MLO deposited $9,300 of marijuana proceeds into N.V.'s Chase Bank account.

169. On November 30, 2013, in Arcata, California, N.V. withdrew $9,100 of marijuana proceeds from her Chase Bank account.

170. On December 6, 2013, in Woodmere, Ohio, a member of the SORGI MLO deposited $5,000 of marijuana proceeds into ALLYSON LOVE's Bank of America account.

171. On December 9, 2013, in Eureka, California, ALLYSON LOVE withdrew $2,500 of marijuana proceeds from her Bank of America account.

172. On December 18, 2013, in Van Wert, Ohio, Fred Bagi deposited $9,400 of marijuana proceeds into N. V.'s Wells Fargo account.

173. On December 18, 2013, in Arcata, California, N.V. withdrew $6,500 of marijuana proceeds from her Wells Fargo account.

174. On December 20, 2013, in Arcata, California, N.V. withdrew $2,500 of marijuana proceeds from her Wells Fargo account.

175. On December 21, 2013, in Van Wert, Ohio, a member of the SORGI MLO deposited $9,000 of marijuana proceeds into ALLYSON LOVE's Wells Fargo account.

176. On December 21, 2013, in Eureka, California, ALLYSON LOVE withdrew $6,820 of marijuana proceeds from her Wells Fargo account.

177. On December 21, 2013, in Van Wert, Ohio, a member of the SORGI MLO deposited $9,300 of marijuana proceeds into MADELAINE DAVIDSON's account.

178. On December 23, 2013, MADELAINE DAVIDSON withdrew $9,000 of marijuana proceeds from her Wells Fargo account.

179. On December 24, 2013, in Van Wert, Ohio, a member of the SORGI MLO made two $9,000 deposits of marijuana proceeds into M.L.'s Wells Fargo accounts.

180. On December 26, 2013, in Arcata, California, M.L. withdrew $18,000 of marijuana proceeds from her Wells Fargo accounts. M.L. gave the cash proceeds to Lavivian Wright.

181. On January 3, 2014, in Van Wert, Ohio, a member of the SORGI MLO made two $7,500 deposits of marijuana proceeds into M.L.'s Wells Fargo account.

182. On January 7, 2014, in Arcata, California, M.L. withdrew $15,000 from her Wells Fargo account.

183. On January 7, 2014, in Harrisburg, Pennsylvania, Fred Bagi deposited $8,900 of marijuana proceeds into MADELAINE DAVIDSON's Wells Fargo account.

184. On January 8, 2014, in Arcata, California, MADELAINE DAVISON withdrew $6,400 in marijuana proceeds from her Wells Fargo account.

185. On January 8, 2014, in Harrisburg, Pennsylvania, Fred Bagi deposited $7,980 of marijuana proceeds into ALLYSON LOVE's Wells Fargo account.

186. On January 8, 2014, in Harrisburg, Pennsylvania, Fred Bagi deposited $9,200 of marijuana proceeds into DUSTIN ALLRED's Wells Fargo account.

187. On January 9, 2014, in Eureka, California, DUSTIN ALLRED withdrew $9,000 of marijuana proceeds from his Wells Fargo account.

188. On January 13, 2014, in Eureka, California, MADELAINE DAVIDSON withdrew $2,200 of marijuana proceeds from her Wells Fargo account.

189. On January 14, 2014, in Arcata, California, ALLYSON LOVE withdrew $6,000 of marijuana proceeds from her Wells Fargo account.

190. On January 14, 2014, in Harrisburg, Pennsylvania, Fred Bagi deposited $9,300 of marijuana proceeds into N.V.'s Wells Fargo account.

191. On January 21, 2014, in Lancaster, Pennsylvania, a member of the SORGI MLO deposited $8,600 of marijuana proceeds into DUSTIN ALLRED's Wells Fargo account.

192. On January 21, 2014, in Eureka, California, N.V. withdrew $8,300 of marijuana proceeds from her Wells Fargo account.

193. On January 22, 2014, in Arcata, California, DUSTIN ALLRED withdrew $6,300 of marijuana proceeds from his Wells Fargo account.

194. On January 23, 2014, in Eureka, California, DUSTIN ALLRED withdrew $1,900 of marijuana proceeds from his Wells Fargo account.

195. On January 25, 2014, in Lancaster, Pennsylvania, a member of the SORGI MLO deposited $9,100 of marijuana proceeds into N.V.'s Wells Fargo account.

196. On January 25, 2014, in Lancaster, Pennsylvania, a member of the SORGI MLO deposited $9,490 of marijuana proceeds into DUSTIN ALLRED's Wells Fargo account.

197. On January 27, 2014, Joshua Watkins received a package under the fictitious name "Joe Smith" at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

198. On January 27, 2014, in Arcata, California, N.V. withdrew $2,500 of marijuana proceeds from her Wells Fargo account.

199. On January 28, 2014, in Arcata, California, DUSTIN ALLRED withdrew $4,700 of marijuana proceeds from his Wells Fargo account.

200. On January 28, 2014, in Fortuna, California, N.V. withdrew $2,500 of marijuana proceeds from her Wells Fargo account.

201. On January 30, 2014, in Eureka, California, DUSTIN ALLRED withdrew $4,300 of marijuana proceeds from his Wells Fargo account.

202. On January 31, 2014, in Eureka, California, N.V. withdrew $2,300 of marijuana proceeds from her Wells Fargo account.

203. On February 15, 2014, in Van Wert, Ohio, a member of the SORGI MLO deposited $5,000 of marijuana proceeds into DUSTIN ALLRED's Wells Fargo account.

204. On February 19, 2014, in Arcata, California, DUSTIN ALLRED withdrew $2,800 of marijuana proceeds from his Wells Fargo account.

205. On February 20, 2014, in Eureka, California, DUSTIN ALLRED withdrew $2,000 of marijuana proceeds from his Wells Fargo account.

206. On March 24, 2014, in Woodmere, Ohio, a member of the SORGI MLO deposited $3,500 of marijuana proceeds into ALLYSON LOVE's Bank of America account.

207. On March 24, 2014, in Pittsburgh, Pennsylvania, a member of the SORGI MLO deposited $3,020 of marijuana proceeds into ALLYSON LOVE's Bank of America account.

208. On March 25, 2014, in Eureka, California, ALLYSON LOVE withdrew $4,600 of marijuana proceeds from her Bank of America account.

209. On March 28, 2014, in Eureka, California, ALLYSON LOVE withdrew $700 of marijuana proceeds from her Bank of America account.

210. On April 15, 2014, CRAIG KAVAK sold 111.5 grams of marijuana to CS4.

211. On May 6, 2014, Lavivian Wright cashed four $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

212. On May 7, 2014, CRAIG KAVAK and B.M. sold 117.6 grams of marijuana to CS4.

213. On May 13, 2014, Lavivian Wright cashed five $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

214. On May 14, 2014, Lavivian Wright cashed a $1,000 U.S. Postal Service money order that constituted marijuana proceeds from Ohio.

215. On May 14, 2014, J.M. cashed a $1,000 U.S. Postal Service money order that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

216. On May 15, 2014, T.M. cashed four $1,000 U.S. Postal Service money orders made payable to J.M. that constituted marijuana proceeds from Ohio. T.M. gave the cash proceeds to Lavivian Wright.

217. On May 15, 2014, in Woodmere, Ohio, a member of the SORGI MLO deposited $1,700 of marijuana proceeds into ALLYSON LOVE's Bank of America account.

218. On May 19, 2014, Lavivian Wright cashed three $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

219. On May 21, 2014, Lavivian Wright cashed two $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

220. On May 27, 2014, a member of the SORGI MLO mailed marijuana proceeds to "M. Mills" at an address on Trojan Street in Arcata, California.

221. On May 28, 2014, a member of the SORGI MLO mailed marijuana proceeds to "M. Mills" at an address on Trojan Street in Arcata, California.

222. On May 28, 2014, J.M. cashed five $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

223. On June 3, 2014, J.M. cashed four $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

224. On June 3, 2014, in Decatur, Indiana, CRAIG KAVAK deposited $8,000 of marijuana proceeds into his Wells Fargo bank account.

225. On June 4, 2014, Lavivian Wright cashed three $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

226. On June 4, 2014, Ryan Rodriguez attempted to send $5,000 of marijuana proceeds in the form of money orders to P.C. in Hydesville, California.

227. On June 4, 2014, Ryan Rodriguez attempted to send $8,000 of marijuana proceeds in the form of money orders to M.S. in Hydesville, California.

228. On June 5, 2014, in Parma, Ohio, CRAIG KAVAK deposited $4,000 of marijuana proceeds into his US Bank account.

229. On June 7, 2014, in Eureka, California, CRAIG KAVAK withdrew $7,400 of marijuana proceeds from his Wells Fargo account.

230. On June 9, 2014, in Arcata, California, CRAIG KAVAK withdrew $3,700 of marijuana proceeds from his US Bank account.

231. On June 9, 2014, J.M. cashed $6,000 of U.S. Postal Service money orders that constitute marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

232. On June 12, 2014, a member of the SORGI MLO attempted to send $4500 of marijuana proceeds in the form of money orders to P.C. in Hydesville, CA.

233. On June 16, 2014, J.M. cashed $2,000 of U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

234. On June 16, 2014, a member of the SORGI DTO received a package at an address on Meadowland Drive in Brunswick, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

235. On June 17, 2014, T.M. cashed four $1,000 U.S. Postal Service money orders that were made payable to Lavivian Wright, which constituted marijuana proceeds from Ohio.

236. On June 19, 2014, a member of the SORGI MLO received a package at an address on Meadowland Drive in Brunswick, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California.

237. On June 19, 2014, Lavivian Wright cashed three $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

238. On June 20, 2014, Lavivian Wright cashed three $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio.

239. On June 20, 2014, J.M. cashed two $1,000 U.S. Postal Service money orders that constituted marijuana proceeds from Ohio. J.M. gave the cash proceeds to Lavivian Wright.

240. On June 24, 2014, in California, a member of the SORGI DTO sent 5 pounds of marijuana to an address on Meadowland Drive in Brunswick, Ohio, via the United States Mail.

241. On June 25, 2014, in California, a member of the SORGI DTO sent 5 pounds of marijuana to STUART PFLAUM at an address on Meadowland Drive in Brunswick, Ohio, via the United States Mail.

242. On June 25, 2014, a member of the SORGI MLO mailed marijuana proceeds to "M. Mills" at an address on Trojan Street in Arcata, California.

243. On June 26, 2014, in California, a member of the SORGI DTO sent 6 pounds of marijuana to STUART PFLAUM at an address on Storer Avenue in Cleveland, Ohio, via the United States Mail.

244. On June 30, 2014, in Parma, Ohio, a member of the SORGI MLO deposited $6,000 of marijuana proceeds into CRAIG KAVAK's US Bank account.

245. On July 1, 2014, in Arcata, California, CRAIG KAVAK withdrew $5,200 of marijuana proceeds from his US Bank account.

246. On July 2, 2014, in Arcata, California, CRAIG KAVAK withdrew $700 of marijuana proceeds from his US Bank account.

247. On July 7, 2014, a member of the SORGI MLO attempted to mail $6,000 of marijuana proceeds in the form of money orders, which were made payable to CRAIG KAVAK, to McKinleyville, California.

248. On July 22, 2014, in Hoagland, Indiana, a member of the SORGI MLO deposited $8,700 into CRAIG KAVAK's Wells Fargo account.

249. On July 23, 2014, in Parma, Ohio, a member of the SORGI MLO deposited $8,700 of marijuana proceeds into CRAIG KAVAK's US Bank account.

250. On July 29, 2014, in Eureka, California, CRAIG KAVAK withdrew $7,200 of marijuana proceeds from his US Bank account.

251. On July 30, 2014, in Arcata, California, CRAIG KAVAK withdrew $6,000 of marijuana proceeds from his Wells Fargo account.

252. On August 7, 2014, in Decatur, Indiana, a member of the SORGI MLO deposited $7,980 of marijuana proceeds into CRAIG KAVAK's Wells Fargo account.

253. On August 11, 2014, in Eureka, California, CRAIG KAVAK withdrew $8,000 of marijuana proceeds from his Wells Fargo account.

254. On November 10, 2014, in California, a member of the SORGI DTO attempted to send 5 pounds of marijuana and 2 pounds of hash oil to an address on Lark Street in Lakewood, Ohio, via the United States Mail.

255. On November 12, 2014, in California, a member of the SORGI DTO attempted to send 5 pounds of marijuana and 2 pounds of hash oil to an address on Lark Street in Lakewood, Ohio, via the United States Mail.

256. On November 12, 2014, in California, a member of the SORGI DTO attempted to send 6 pounds of marijuana to at an address on Paw Paw Lake Drive in Chagrin Falls, Ohio, via the United States Mail.

All in violation of Title 18, Section 1956(h), United States Code.

FORFEITURE

The Grand Jury further charges:

A. The allegations of Count 1 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(1). As a result of the foregoing offense, defendants JAMES SORGI, ROBERT SERINA, STUART PFLAUM, CRAIG KAVAK, ALLYSON LOVE, DINO SILVESTRI, DUSTIN ALLRED, MADELAINE DAVIDSON, and DANIEL LINTON shall forfeit to the United States all property, real and personal, involved in such offense, and all property traceable to such property; including, but not limited to, the following:

a.) $5,400.00 in U.S. Currency seized on or about October 5, 2013, from a parcel sent in the United States Mail.

b.) $5,500.00 in U.S. Currency seized on or about October 5, 2013, from a parcel sent in the United States Mail.

c.) $5,500.00 in U.S. Currency seized on or about October 7, 2013, from a parcel sent in the United States Mail.

d.) $5,500.00 in U.S. Currency seized on or about October 7, 2013, from a parcel sent in the United States Mail.

e.) $7,000.00 in U.S. Currency seized on or about October 9, 2013, from a parcel sent in the United States Mail.

f.) $8,500.00 in U.S. Currency seized on or about October 9, 2013, from a parcel sent in the United States Mail.

g.) $8,700.00 in U.S. Currency seized on or about October 10, 2013, from a parcel sent in the United States Mail.

h.) $5,000.00 in U.S. Currency seized on or about October 11, 2013, from a parcel sent in the United States Mail.

i.) $5,000.00 in U.S. Currency seized on or about October 11, 2013, from a parcel sent in the United States Mail.

j.) $5,000.00 in the form of money orders seized on or about June 4, 2014, from a parcel sent in the United States Mail.

k.) $8,000.00 in the form of money orders seized on or about June 4, 2014, from a parcel sent in the United States Mail.

l.) $4,500.00 in the form of money orders seized on or about June 12, 2014, from a parcel sent in the United States Mail.

m.) $6,000.00 in the form of money orders seized on or about July 7, 2014, from a parcel sent in the United States Mail.

n.) $6,500.00 in the form of money orders and a US Bank Visa debit card seized on or about November 13, 2014, from a parcel sent in the United States Mail.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.